

RE: RESPONSE SUMMARY
Dutton-Lainson Company
1601 W. 2nd St, Hastings, Nebraska
NDEQ Facility # 00125

To Whom It May Concern:

The Nebraska Department of Environmental Quality (NDEQ) has considered all comments received and has made a final decision to modify and issue Operating Permit #OP12R1-015 for the above referenced facility. This Permit approves the operation of a fabricated metal product manufacturing facility in accordance with regulations contained in Title 129 - Air Quality Regulations.

The decision regarding issuance of this Operating Permit may be appealed under Neb. Rev. Stat. 81-1509. This appeal shall be done in accordance with the Administrative Procedure Act, Neb. Rev. Stat. Section 84-901 to 84-920 and Title 115 - Rules of Practice and Procedure. In addition, persons may petition the Administrator of the Environmental Protection Agency to object to the issuance of this permit. Unless the petitioner demonstrates that it was impracticable to raise objections during the 30-day public comment period, the petition shall only be based on objections that were raised during such period.

In preparing this summary, the NDEQ reviewed all comments made during the public comment period from December 19, 2014 to January 17, 2015 and listed all comments in the attached Responsiveness Summary. The Responsiveness Summary consists of four sections:

Comment #: The comment is summarized.

Response and Rationale: NDEQ's response to the comment raised and the rationale.

Changes: Any changes to the Permit and/or Fact Sheet are addressed.

Applicable Regulations/Statutes: This is a listing of regulations/statutes pertinent to the comment.

The NDEQ appreciates the time and the conscientious efforts of all that have commented. If you have any questions, please contact Stephenie Moyer or me at (402) 471-2189.

Sincerely,

Shelley Schneider, Air Administrator
Air Quality Division

Date

Enclosure

RESPONSE TO PUBLIC COMMENTS SUMMARY
On the Issuance of an Operating Permit for
Dutton-Lainson (Facility #00125)

Background Information:

Dutton-Lainson Company submitted an Operating Permit application on May 4, 2012. This permit approves the operation of a fabricated metal product manufacturing facility.

The following are NDEQ's responses to the comments received during the public comment period:

All of the comments were submitted by Dutton-Lainson Company on January 15, 2015.

COMMENT #1: Section III (A)(4)(a)(i) 1. & 2. – CFR40 section 63.463(a)(1) states either condition i (an idling and downtime mode cover) **or** ii (reduced room draft) must be met. Since condition ii is part of our elected control combination (as stated in the permit section III(4)(a)(i)1), why is there a requirement for an idling and downtime mode cover in permit condition (4)(a)(i)2 ?

RESPONSE AND RATIONALE: The idling and downtime mode cover requirement was carried over from the previous OP. After review of NESHAP Subpart T [§63.463(a)(1)], it was determined that the commenter was correct.

CHANGES: Condition III.(A)(4)(a)(i)2. {in reference to §63.463(a)(1)(i)} is removed, and the subsequent conditions in Condition III.(A)(4)(a)(i) were renumbered. Minor changes to Fact Sheet discussion of Condition III.(A)(4) [page 15], 2nd sentence.

APPLICABLE REGULATIONS: NESHAP Subpart T; Title 129, Chapter 28, Section 001.05

COMMENT #2: Section III (A)(4)(a)(i) 4 – CFR40 Section 63.463(a)(4) states this condition does not apply to units using steam to heat the solvent. That's what we do, so why is this condition in the permit?

RESPONSE AND RATIONALE: The device to shut off sump heat requirementr was carried over from the previous OP. After review of NESHAP Subpart T [§63.463(a)(1)], it was determined that the commenter was correct.

CHANGES: Condition III.(A)(4)(a)(i)4. {in reference to §63.463(a)(4)} is removed, and the subsequent conditions in Condition III.(A)(4)(a)(i) were renumbered. Minor changes to Fact Sheet discussion of Condition III.(A)(4) [page 15], 2nd sentence.

APPLICABLE REGULATIONS: NESHAP Subpart T; Title 129, Chapter 28, Section 001.05

COMMENT #3: Section III (A)(4)(a)(ii) 1. – Referenced conditions should be B and C, not A and B.

RESPONSE AND RATIONALE: After review of NESHAP Subpart T [§63.463(d)(1)(ii) and (e)(ii)], it was determined that the commenter is correct.

CHANGES: Corrected Condition III.(A)(4)(a)(ii)1. The references changed to B and C respectively.

APPLICABLE REGULATIONS: NESHAP Subpart T; Title 129, Chapter 28, Section 001.05

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COMMENT #4: Section III (C)(4) (i thru iv) – the dry filters on the powder booth reclaim units and in the hand booth are clearly visible to the operator at all times the units are in operation. Conditions i and ii are reasonable controls to ensure these filters are effective. Condition iii may be of value if the filters were not in plain view of the operator (i.e. in a filter box or room), but that is not the case. Documenting this observation daily (even if the units are not used daily) is an unnecessary administrative burden, especially given that condition ii already ensures the filters will be maintained. Condition iv still requires an on-site inventory of spare filters. We have no operational need or requirement for rapid replacement of filters. The plant will not shut down if we cannot run the paint booth for a couple of days to get new filters in. We do not believe having an inventory of spare filters on hand should be an enforceable condition of our permit.

RESPONSE AND RATIONALE: Condition III.(C)(4)(iii) applies only to logging observations when the booth is operational, with the observations used to spot problems with the filter system/filters quickly. Since the operator of the booths can easily observe the filter system/filters, they will only need to log what they saw. The log can consist of a check box for no problems observed, a place for the operator to initial, and an area for operator to identify any problems observed. For Condition III.(C)(4)(iv), the facility is willing to shutdown the paint booths if the filters need to be replaced and none are on-site; the facility will be subject to enforcement by NDEQ if an inspection show the paint booths were operated without the filters.

CHANGES: Condition III.(C)(4)(i), (ii) and (iii) no change. Removed Condition III.(C)(4)(iv) {pertaining to keeping spare filters on site}.

APPLICABLE REGULATIONS: Title 129, Chapter 20, Sections 001 and 004; and Chapter 8, Section 004.

COMMENT #5: Section III (D)(2)(a) – states that NESHAP Subpart DDDDD shall be in compliance upon issuance, but (i) states compliance by January 31, 2016. This requirement is unclear.

RESPONSE AND RATIONALE: The language in the permit is the standard language for emission units subject to a NESHAP. Commenter is correct that this requirement is unclear, since the NESHAP compliance date is a future date.

CHANGES: Removed “Upon issuance of this permit,” from Condition III.(D)(2)(a) – the source will need to be in compliance with NESHAP Subpart DDDDD by January 31, 2016 (in Condition III.(D)(2)(a)(1)).

APPLICABLE REGULATIONS: NESHAP Subpart DDDDD; Title 129, Chapter 28, Section 001.70

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COMMENT #6: Section III (D)(4) – As we understand the DDDDD for our two natural gas fired units operating below 5 million Btu/h: we must conduct a one-time energy assessment of each boiler and process heater (noted in Section III (D)(4)(a)(i)) , properly maintain the units (ii), and do a tune-up every 5 years (iii). Reporting should be initial compliance, compliance every five years, and any non-compliance or deviations reports that may come up. Why is there an annual requirement for a report stuck in III(D)(4)(a)(iii)6?

RESPONSE AND RATIONALE: Condition III.(D)(4)(a)(iii)(6) is from §63.7540(a)(10)(vi) referenced from §63.7540(a)(12). This is a record of CO concentrations measured (as specified) and the corrective actions taken as part of the tune-up. This annual report only has to be on-site, and submitted when NDEQ has requested it.

CHANGES: No changes

APPLICABLE REGULATIONS: NESHAP Subpart DDDDD [§63.7540(a)(10)(vi)]; Title 129, Chapter 28, Section 001.70

COMMENT #7: Section III (D)(5)(a)(iii) – Is the department requiring us to do compliance demonstration for these units? If so why?

RESPONSE AND RATIONALE: Condition III.(D)(5)(a)(iii) is from NESHAP Subpart DDDDD §63.7530(f). §63.7530(f) requires a submittal of Notification of Compliance demonstrating initial compliance in accordance to §63.7545(e).

CHANGES: No changes.

APPLICABLE REGULATIONS: NESHAP Subpart DDDDD [§63.7530(f)]; Title 129, Chapter 28, Section 001.70

COMMENT #8: Section III (D)(5)(iv) – Why is this section in the permit? Condition (D)(4)(b) already states we can only use natural gas.

RESPONSE AND RATIONALE: Condition III.(D)(5)(a)(iv) is from NESHAP Subpart DDDDD §63.7545(h). This condition applies to a physical change or fuel switches which causes the unit to become applicable to a different subcategory. Since Condition III.(D)(4)(b) of the permit limits fuel to natural gas only, the references in Condition III.(D)(5)(a)(iv) to fuel switches don't apply.

CHANGES: Condition III.(D)(5)(a)(iv) removed references to fuel switches. Minor changes to Fact Sheet discussion of Condition III.(D)(5)(a) [page 17], 4th sentence and added a sentence explaining why the fuel switch language from the NESHAP requirement was not included in the permit.

APPLICABLE REGULATIONS: NESHAP Subpart DDDDD [§63.7545(h)]; Title 129, Chapter 28, Section 001.70

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COMMENT #9: Section III (D)(5)(vi)2 – Why list ‘records of compliance demonstrations’?

RESPONSE AND RATIONALE: Condition III.(D)(5)(vi) is from NESHAP Subpart DDDDD §63.7555(a)(2). This NESHAP requirement pertains to records of performance tests, fuel analyses or other compliance demonstrations. Since this facility is not required to conduct performance tests or fuel analyses, it is subject to the other compliance demonstrations. For this facility, the other compliance demonstrations pertain to records of the tune-ups and the corrective actions taken.

CHANGES: No change.

APPLICABLE REGULATIONS: NESHAP Subpart DDDDD [§63.7555(a)(2)]; Title 129, Chapter 28, Section 001.70

COMMENT #10: Section III (E)(3) table –The department is still requiring opacity monitoring for the zinc process equipment. We contend this is totally unnecessary.

Emission point 351-1, the zinc die cast machine, uses only virgin zinc ingots. There are no impurities, it is not recycled zinc. The process noted in the fact sheet, AP-42 chapter 14, pertains to ‘secondary zinc industry processing scrap metals’. Would it be possible to have a condition in the permit that limits us to only melting this zinc in order to ensure the opacity limit will not be exceeded?

Emission point 359.1, scrubber discharge from the plating lines. This discharge is almost entirely water vapor coming off a combination of all of the plating tanks. The water vapor is only visible on the driest of days. We ask that you please consult with Chris Helms as to the frugality of opacity monitoring to determine any HAP or PM emission from the plating lines.

RESPONSE AND RATIONALE: For Emission Point 351-1, the emission factor for casting is appropriate for virgin zinc ingots or “secondary zinc industry processing scrap metals”. This emission factor is for casting that has already removed the impurities and pouring into ingots. EPA doesn’t have an emission factor for every industrial process. Therefore, emission factors for similar processes can be used. The casting at the secondary zinc industry processing scrap metal melts the zinc clean from impurities so that it can be poured into ingot shaped molds. The casting at Dutton-Lainson melts zinc ingots so that in can be poured into molds for final products.

For Emission Point 359-1, emissions other than PM can cause opacity in rare situations (i.e. acid mist), but PM is the most common.

All emission units are subject to the opacity limitation of 20% from Title 129. NDEQ’s expectation is that as long as the zinc die cast machine and the zinc plating lines are properly operated and maintained, the opacity from these units will be below 20%. Therefore, no periodic opacity testing (visible emission readings or Method 9 opacity readings) are required. The only monitoring requirements are referred to in Condition II.(F) which would be required for all emission units (except insignificant activities) at the facility.

CHANGES: No change to the permit. Change reference in spreadsheet for Emission Point 351-1 to include “casting” operation, to clarify which emission factor used.

APPLICABLE REGULATIONS: Title 129, Chapter 20

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SUMMARY OF ADDITIONAL CHANGES:

1. Upon review of Emission Point 351-1 emission factor for PM from AP-42, it was determined that the fugitive PM emission factor was incorrect. In the draft permit's emission calculations, it had 0.0015 lb PM/ton zinc cast. AP-42 Chapter 12.14, Table 12.14-4 has 0.015 lb PM/ton zinc cast. The emission factor for PM, PM₁₀, and PM_{2.5} {PM₁₀ and PM_{2.5} are assumed to equal PM.} were corrected to 0.315 lb/ton zinc cast {0.30 lb/ton zinc cast average stack emissions + 0.015 lb/ton zinc cast fugitive emissions}. With this correction, the facility summary of potential emissions table in the fact sheet change the PM, PM₁₀, and PM_{2.5} PTE value from 1.55 tons/yr to 1.56 tons/yr. Note: The 2013 Emission Inventory had the same error.

Questions regarding this summary may be directed to:

Air Quality Division-Permitting Section
Nebraska Department of Environmental Quality
PO Box 98922
Lincoln, NE 68509-8922